

EXHIBIT A



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 7, 2018

VIA EMAIL AND U.S. MAIL

Amanda M. Williams
Gustafson Gluek PLLC
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
awilliams@gustafsongluek.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Malinski, Michael v. 3M Company et al Case No.: 0:17-cv-00088-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Malinski
Plaintiffs' First Name	Michael
Case No.	17-cv-0088
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Gustafson Gluek PLLC
I.03.e - Plaintiffs' Counsel's Email	awilliams@gustafsongluek.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 15, 2018

VIA EMAIL AND U.S. MAIL

Daniel C. Burke
Bernstein Liebhard LLP
10 E. 40th Street
New York, NY 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Brasher, Michael v. 3M Company et al Case No.: 0:18-cv-00220-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Brasher
Plaintiffs' First Name	Michael
Case No.	18-cv-00220-JNE-FLN
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2, 14
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard LLP
I.03.e - Plaintiffs' Counsel's Email	dlee@bernlieb.com



Benjamin W. Hulse
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November 8, 2018

VIA EMAIL AND U.S. MAIL

Theresa M Walsh
Brown Chiari, LLP
5775 Broadway
Lancaster, NY 14086
twalsh@brownchiari.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Woelfel, Rosemarie et al v. 3M Company et al Case No.: 0:18-cv-01009-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Woelfel
Plaintiffs' First Name	Rose Marie
Case No.	0:18-cv-010009-JNE-DTS
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	2
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Brown Chiari LLP
I.03.e - Plaintiffs' Counsel's Email	twalsh@brownchiari.com



Benjamin W. Hulse
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December 3, 2018

VIA EMAIL AND U.S. MAIL

Kristine Kraft
Schlichter Bogard & Denton, LLP
100 S. Fourth Street, Ste 1200
St. Louis, MO 63102
rharris@uselaws.com
hgrupe@uselaws.com
kkraft@uselaws.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Davis, Harry v. 3M Company et al Case No.: 0:18-cv-01542-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

Plaintiffs' Last Name	Davis
Plaintiffs' First Name	Harry
Case No.	18-cv-01542
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	07 08
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Schlichter Bogard
I.03.e - Plaintiffs' Counsel's Email	hgrupe@uselaws.com kkraft@uselaws.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 1, 2018

VIA EMAIL AND U.S. MAIL

Christopher Coffin
Pendley, Baudin & Coffin L.L.P.
24110 Eden St.P.O. Drawer 71
Plaquemine, LA 70765
ccoffin@pbclawfirm.com
nrockforte@pbclawfirm.com
jperez@pbclawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Woodard, George v. 3M Company et al Case No.: 0:18-cv-01722-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

Plaintiffs' Last Name	Woodard
Plaintiffs' First Name	George
Case No.	0:18-cv-01722
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin & Coffin LLP
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 15, 2018

VIA EMAIL AND U.S. MAIL

Christopher Coffin
Pendley, Baudin & Coffin L.L.P.
24110 Eden St.P.O. Drawer 71
Plaquemine, LA 70765
ccoffin@pbclawfirm.com
nrockforte@pbclawfirm.com
jperez@pbclawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Cooper, Roy et al v. 3M Company et al Case No.: 0:18-cv-01724-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

Plaintiffs' Last Name	Cooper
Plaintiffs' First Name	Roy & Valerie
Case No.	0:18-cv-01724
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Pendley, Baudin & Coffin LLP
I.03.e - Plaintiffs' Counsel's Email	sshirey@pbclawfirm.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

December 3, 2018

VIA EMAIL AND U.S. MAIL

Daniel Christopher Burke
Bernstein Liebhard LLP
10 East 40th Street
New York, New York 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Johnson, Sheri v. 3M Company et al. Case No.: 0:18-cv-02014-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Johnson
Plaintiffs' First Name	Sheri
Case No.	18-cv-02014
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	1
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	1
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard
I.03.e - Plaintiffs' Counsel's Email	dburke@bernlieb.com dweck@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 20, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Sullivan, Jeffrey v. 3M Company et al Case No.: 0:18-cv-02065-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Sullivan
Plaintiffs' First Name	Jeff
Case No.	18-cv-2065
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 04, 05, 06, 07, 08 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	3
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 15, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
McGuire, Maria v. 3M Company et al Case No.: 0:18-cv-02080-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	McGuire
Plaintiffs' First Name	John
Case No.	18-cv-2080
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 20, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Rhodes, Sarah v. 3M Company et al Case No.: 0:18-cv-02211-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Rhodes
Plaintiffs' First Name	Sarah
Case No.	18-cv-2211
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	1
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 20, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Torrez, Macario v. 3M Company et al Case No.: 0:18-cv-02220-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Torrez
Plaintiffs' First Name	Macario
Case No.	18-cv-2220
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com

EXHIBIT B



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

June 27, 2018

VIA EMAIL AND U.S. MAIL

Amanda M. Williams
Gustafson Gluek PLLC
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
awilliams@gustafsongluek.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Ballasso, Marilyn v. 3M Company et al Case No.: 0:18-cv-00575-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Ballasso
Plaintiffs' First Name	Marilyn
Case No.	18-cv-00575
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	01 03 04 05
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Gustafson Gluek PLLC
I.03.e - Plaintiffs' Counsel's Email	awilliams@gustafsongluek.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 7, 2018

VIA EMAIL AND U.S. MAIL

Travis R. Walker
The Law offices of Travis R. Walker, P.A.
1235 SE Indian Street, Suite 101
Stuart, Florida 34997
traviswalker@traviswalkerlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Villafranco, Leonard v. 3M Company et al Case No.: 0:18-cv-00852-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Villafranco
Plaintiffs' First Name	Leonard S.
Case No.	Villafranco_Leonard_018-cv-00852-JNE-FLN_1_Villafranco_Leonard_018-cv-00852-JNE-FLN_1
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	The Law Office of Travis R Walker
I.03.e - Plaintiffs' Counsel's Email	service@traviswalkerlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 15, 2018

VIA EMAIL AND U.S. MAIL

Jeffrey Alan Travers
The Miller Firm, LLC
108 Railroad Avenue
Orange, VA 22960
jtravers@millerfirmllc.com;
TShah@MillerFirmLLC.com
jtravers@millerfirmllc.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Rhock, Leonard v. 3M Company et al Case No.: 0:18-cv-01031-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

Plaintiffs' Last Name	Rhock
Plaintiffs' First Name	Leonard J.
Case No.	18-cv-01031
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	The Miller Firm LLC
I.03.e - Plaintiffs' Counsel's Email	tshah@millerfirmllc.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

November 15, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
316 South Baylen St. Suite 400
Pensacola, Florida 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Johnson, Alvin v. 3M Company Case No.: 0:18-cv-01051-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Johnson
Plaintiffs' First Name	Alvin
Case No.	0:18-cv-01051
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02, 03, 04, 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 17, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Tedford, Louise v. 3M Company Case No.: 0:18-cv-01103-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Tedford
Plaintiffs' First Name	Louise
Case No.	0:18-cv-01103
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	1, 4
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02 03, 05 06, 08 09, 10 11, 12 13, 14 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02 03, 04 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

August 24, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St, Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Eans, James v. 3M Company Case No.: 0:18-cv-01167-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Eans
Plaintiffs' First Name	James
Case No.	0:18-cv-01167
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
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December 3, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh

Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

316 S Baylen St, Ste 600

Pensacola, FL 32502

dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Gregory, Janice v. 3M Company Case No.: 0:18-cv-01169-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Enclosure

Plaintiffs' Last Name	Gregory
Plaintiffs' First Name	Janice
Case No.	0:18-cv-01169
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03 08, 09, 10 11, 12, 13 14, 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 11, 2018

VIA EMAIL AND U.S. MAIL

James Arthur Morris
Morris Law Firm
4111 W. Alameda Avenue, Suite 611
Burbank, CA 91505
jmorris@jamlawyers.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Terrell, Elizabeth v. 3M Company et al Case No.: 18-cv-01654-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Terrell
Plaintiffs' First Name	Elizabeth
Case No.	0:18-cv-01654
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	02 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Morris Law Firm
I.03.e - Plaintiffs' Counsel's Email	sgreenberg@jamlawyers.com

EXHIBIT C



**LEVIN • PAPANTONIO
THOMAS • MITCHELL
RAFFERTY & PROCTOR • P.A.**
PROFESSIONAL CORPORATION ATTORNEYS AT LAW

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BRIAN H. BARR
MICHAEL C. BIXBY
M. ROBERT BLANCHARD
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RACHAEL R. GILMER
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ROBERT M. LOEHR
STEPHEN A. LUONGO
M. JUSTIN LUSKO
NEIL E. McWILLIAMS, JR.
CLAY MITCHELL
PETER J. MOUGEY
DANIEL A. NIGH
TIMOTHY M. O'BRIEN

MIKE PAPANTONIO
CHRISTOPHER G. PAULOS
EMMIE J. PAULOS
A. RENEE PRESTON
ROBERT E. PRICE
MARK J. PROCTOR
TROY A. RAFFERTY
MATTHEW D. SCHULTZ
W. CAMERON STEPHENSON
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BRETT VIGODSKY

OF COUNSEL:
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AND MARYLAND)
LEFFERTS L. MABIE, JR. (1925-1996)
D.L. MIDDLEBROOKS (1926-1997)
DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

September 7, 2018

RECEIVED
SEP 10 2018

BY:C.K.....

VIA REGULAR MAIL AND EMAIL

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
Suite 2500
Minneapolis, MN 55415
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Louise Tedford v. 3M Company, Case No. 0:18-cv-01103-JNE-DTS

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/dm
Enclosure

Response to Deficiencies

Louise Tedford v. 3M Company, Case No. 0:18-cv-01103-JNE-DTS

Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.



KIMBERLY LAMBERT ADAMS
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M. JUSTIN LUSKO
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DAVID H. LEVIN (1928-2002)
STANLEY B. LEVIN (1938-2009)

September 13, 2018

RECEIVED
SEP 17 2018

BY:CK.....

VIA REGULAR MAIL AND EMAIL

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street
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Minneapolis, MN 55415
bhulse@blackwellburke.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
James Eans v. 3M Company, Case No. 0:18-cv-01167-JNE-DTS

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec
Enclosure

Response to Deficiencies

James Eans v. 3M Company, Case No. 0:18-cv-01167-JNE-DTS

Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.

We are currently waiting on an updated signed re-verification page from client and will submit once it is received.

EXHIBIT D

From: Ben Hulse

Sent: Friday, January 11, 2019 12:39 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>; schultz_chambers@mnd.uscourts.gov

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann

<Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbeshher.com'

<gzimmerman@meshbeshher.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>;

'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>;

'David J. Szerlag' <david@pritzkerlaw.com>; 'Wendy Thayer' <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for January 2019

Dear Judge Ericksen,

Although this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117, and the December 20, 2018 Amended Court Minutes, Dkt. No. 1651.

The spreadsheets with the lists of disputed cases are attached.

Best regards,

Ben Hulse

Counsel for Defendants

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Direct (612) 343-3256
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated January 11, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-01977-JNE-DTS	Corriher, Kimberlie v. 3M Company et al	7/13/2018	10/11/2018	11/9/2018 12/14/2018	Kennedy Hodges, LLP
0:18-cv-02052-JNE-DTS	Mackenzie, Bonnie v. 3M Company et al	7/19/2018	10/17/2018	11/9/2018 12/14/2018	Kennedy Hodges, LLP
0:18-cv-02082-JNE-DTS	English, Alfred v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018	Kennedy Hodges, LLP
0:18-cv-02067-JNE-DTS	Norton, Lloyd v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018	Meshbesher & Spence
0:18-cv-02087-JNE-DTS	Bellach, (Dimesa, Maria) v. 3M Company	7/23/2018	10/21/2018	11/9/2018 12/14/2018	Napoli Bern Ripka Shkolnik LLP
0:18-cv-02117-JNE-DTS	Banks, Annina v. 3M Company et al	7/24/2018	10/22/2018	11/9/2018 12/14/2018	The Miller Firm, LLC
0:18-cv-02394-JNE-DTS	Block, William v. 3M Company et al	8/15/2018	11/13/2018	12/14/2018	Law Offices of Travis Walker, PA
0:18-cv-02439-JNE-DTS	Peck, Suzanne v. 3M Company et al	8/21/2018	11/19/2018	12/14/2018	DeGaris & Rogers, LLC
0:18-cv-02461-JNE-DTS	Galland-Corley, Rita v. 3M Company et al	8/22/2018	11/20/2018	12/14/2018	Bernstein Liebhard LLP
0:18-cv-02488-JNE-DTS	Morin, Denise v. 3M Company et al	8/24/2018	11/22/2018	12/14/2018	Meshbesher & Spence, LTD.
0:18-cv-02509-JNE-DTS	Guillory, Yvonne v. 3M Company et al	8/28/2018	11/26/2018	12/14/2018	The Olinde Firm, LLC
0:16-cv-00521-JNE-DTS	Mary Ruth Eva Turner (Doyal Turner) v. 3M Company	3/1/2016	9/24/2018		The Olinde Firm, LLC
0:18-cv-02095-JNE-DTS	Jenkins, Carole v. 3M Company et al	7/23/2018	10/21/2018		Bachus & Schanker, LLC
0:18-cv-02708-JNE-DTS	Ledford, Charles v. 3M Company et al	9/19/2018	12/18/2018		Kirtland and Packard LLP
0:18-cv-02723-JNE-DTS	Lott, Mark v. 3M Company et al	9/21/2018	12/20/2018		Bernstein Liebhard LLP
0:18-cv-02729-JNE-DTS	Palumbo, Paula v. 3M Company et al	9/21/2018	12/20/2018		Kirtland & Packard LLP
0:18-cv-02788-JNE-DTS	Debose, Jacqueline v. 3M Company et al	9/27/2018	12/26/2018		Kirtland and Packard LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated January 11, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-02789-JNE-DTS	Light, Johnny v. 3M Company et al	9/27/2018	12/26/2018		Davis & Crump, P.C.
0:18-cv-02823-JNE-DTS	Rudd, Carol v. 3M Company et al	10/2/2018	12/31/2018		Gustafson Gluek PLLC
0:18-cv-02836-JNE-DTS	Ford, Shirley v. 3M Company et al	10/3/2018	1/1/2019		Davis & Crump, P.C.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated January 11, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018	Schlichter, Bogard & Denton, LLP
0:18-cv-01009-JNE-DTS	Woelfel, Rosemarie et al v. 3M Company et al	11/8/2018	11/29/2018	12/14/2018	Brown Chiari, LLP
0:18-cv-01722-JNE-DTS	Woodard, George v. 3M Company et al	10/1/2018	10/22/2018	11/9/2018 12/14/2018	Pendley, Baudin & Coffin L.L.P.
0:18-cv-01724-JNE-DTS	Cooper, Roy et al v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018	Pendley, Baudin & Coffin L.L.P.
0:18-cv-02042-JNE-DTS	Buddin, Glen et al v. 3M Company et al	11/14/2018	12/5/2018	12/14/2018	DeGaris & Rogers, LLC
0:18-cv-02061-JNE-DTS	Oedekoven, Cindy v. 3M Company et al	11/14/2018	12/5/2018	12/14/2018	Kennedy Hodges, LLP
0:18-cv-02080-JNE-DTS	McGuire, Maria v. 3M Company et al	11/15/2018	12/6/2018	12/14/2018	Kennedy Hodges, LLP
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	12/3/2018	12/24/2018		Schlichter Bogard & Denton, LLP
0:18-cv-02014-JNE-DTS	Johnson, Sheri v. 3M Company et al.	12/3/2018	12/24/2018		Bernstein Liebhard LLP
0:18-cv-02023-JNE-DTS	Bankosky, Frederick v 3M Company et al	12/3/2018	12/24/2018		Bernstein Liebhard LLP
0:18-cv-02065-JNE-DTS	Sullivan, Jeffrey v. 3M Company et al	11/20/2018	12/11/2018		Kennedy Hodges, LLP
0:18-cv-02210-JNE-DTS	Price, Steven v. 3M Company et al	11/20/2018	12/11/2018		Kennedy Hodges, LLP
0:18-cv-02211-JNE-DTS	Rhodes, Sarah v. 3M Company et al	11/20/2018	12/11/2018		Kennedy Hodges, LLP
0:18-cv-02220-JNE-DTS	Torrez, Macario v. 3M Company et al	11/20/2018	12/11/2018		Kennedy Hodges, LLP
0:18-cv-02225-JNE-DTS	Harris, Gloria v. 3M Company et al	11/20/2018	12/11/2018		Brown & Crouppen, PC
0:18-cv-02341-JNE-DTS	Hoff, Amber v. 3M Company et al	12/11/2018	1/1/2019		Kennedy Hodges, LLP
0:18-cv-02453-JNE-DTS	Hickman, Carolyn v. 3M Company et al	12/6/2018	12/27/2018		The Miller Firm, LLC

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated January 11, 2018)

Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-00088-JNE-DTS	Malinski, Michael v. 3M Company et al	11/7/2018	11/28/2018	12/14/2018	Gustafson Gluek PLLC
0:18-cv-00220-JNE-DTS	Brasher, Michael v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:18-cv-01001-JNE-DTS	Leffelman, Harold v. 3M Company et al	10/24/2018	11/14/2018	12/14/2018	Meshbesher & Spence
0:18-cv-01634-JNE-DTS	Otero, Brenda v. 3M Company et al	12/4/2018	12/25/2018		Kennedy Hodges, LLP
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-00445-JNE-DTS	Haskell, Sandra v. 3M Company et al	11/6/2018	11/27/2018	12/14/2018	Davis & Crump, P.C.
0:17-cv-04512-JNE-DTS	Cunningham, Mary v. 3M Company et al	12/6/2018	12/7/2018		Bernstein Liebhard LLP
0:17-cv-04889-JNE-DTS	Thornton, Mildred v. 3M Company et al	12/4/2018	12/25/2018		Bernstein Liebhard LLP
0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company et al	12/4/2018	12/25/2018		Bernstein Liebhard LLP
0:18-cv-00063-JNE-DTS	Morgan, Zachary v. 3M Company et al	11/19/2018	12/10/2018		Johnson Becker, PLLC

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated January 11, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:15-cv-03950-JNE-DTS	LeBlanc, John (Shirley Thibodeaux) v. 3M Company et al	10/8/2018	12/14/2018	Law Offices of Travis Walker, PA
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018	11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-04476-JNE-DTS	Holstine, Rachel v. 3M Company et al	9/12/2018	12/14/2018	Bernstein Liebhard LLP
0:17-cv-04777-JNE-DTS	Pine, Randy v. 3M Company et al.	9/4/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:17-cv-04877-JNE-DTS	McDonald, Ethel v 3M et al	10/8/2018	12/14/2018	Bernstein Liebhard LLP
0:17-cv-04885-JNE-DTS	McEvoy, Mark v. 3M Company et al	9/4/2018	12/14/2018	Bernstein Liebhard LLP
0:18-cv-00093-JNE-DTS	Ashley, Ruth v. 3M Company et al	7/16/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:18-cv-00151-JNE-DTS	Russell, Janice v. 3M Company et al	7/16/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:18-cv-00274-JNE-DTS	Malone, Brenda v. 3M Company et al	7/16/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:18-cv-00432-JNE-DTS	Falcetta, Edward v. 3M Company	6/8/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00575-JNE-DTS	Ballasso, Marilyn v. 3M Company et al	6/27/2018	12/14/2018	Gustafson Gluek PLLC
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00852-JNE-DTS	Villafranco, Leonard v. 3M Company et al	8/7/2018	11/9/2018 12/14/2018	The Law offices of Travis R. Walker, P.A.
0:18-cv-00944-JNE-DTS	Kotowski, Joseph et al v. 3M Company et al	8/17/2018	12/14/2018	Meshbesher & Spence

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated January 11, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00963-JNE-DTS	Wolfe, Stanley v. 3M Company	7/5/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00998-JNE-DTS	Caison, John et al v. 3M Company et al	8/22/2018	12/14/2018	Gustafson Gluek PLLC
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018	10/12/2018 11/9/2018 12/14/2018	Kennedy Hodges
0:18-cv-01031-JNE-DTS	Rhock, Leonard v. 3M Company et al	11/15/2018	12/14/2018	The Miller Firm, LLC
0:18-cv-01051-JNE-DTS	Johnson, Alvin v. 3M Company	11/15/2018	12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018	10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01103-JNE-DTS	Tedford, Louise v. 3M Company	8/17/2018	11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018	11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01129-JNE-DTS	Parks, Sherry v. 3M Company et al	8/30/2018	11/9/2018 12/14/2018	The Miller Firm, LLC
0:18-cv-01130-JNE-DTS	Deloach, Marsha v. 3M Company et al	8/30/2018	11/9/2018 12/14/2018	The Miller Firm, LLC
0:18-cv-01167-JNE-DTS	Eans, James v. 3M Company	8/24/2018	11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01191-JNE-DTS	McDonald, Janet v. 3M Company et al	10/11/2018	12/14/2018	GoldenbergLaw, PLLC
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018	10/12/2018 11/9/2018 12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
18-cv-01654-JNE-DTS	Terrell, Elizabeth v. 3M Company et al	10/11/2018	12/14/2018	Morris Law Firm
0:18-cv-01771-JNE-DTS	Royal, Deborah v. 3M Company 3M Company et al	10/8/2018	12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01769-JNE-DTS	McCoy, Ethel v. 3M Company	8/14/2018	12/14/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated January 11, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-02029-JNE-DTS	Frey, Marcia v. 3M Company et al	11/12/2018	12/14/2018	Capretz & Associates
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	10/11/2018		Bernstein Liebhard LLP
0:18-cv-00757-JNE-DTS	Homsher, Larry v. 3M Company et al	10/10/2018		Bernstein Liebhard LLP
0:18-cv-01169-JNE-DTS	Gregory, Janice v. 3M Company	12/3/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01222-JNE-DTS	Ellis, Wanda Kay et al v. 3M Company et al	12/3/2018		Riley & Jackson, P.C
0:18-cv-01524-JNE-DTS	Gleason, Kathryn v. 3M Company	12/13/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01567-JNE-DTS	Gillis, Stanley v. 3M Company et al	11/1/2018		Kennedy Hodges, LLP
0:18-cv-01725-JNE-DTS	Heyward, Jacqueline v. 3M Company et al	10/15/2018		Kennedy Hodges, LLP
0:18-cv-01730-JNE-DTS	Oliver, Kimberly Gaston et al v. 3M Company et al	11/30/2018		Riley & Jackson, P.C.
0:18-cv-01822-JNE-DTS	Jefferson, Frank v. 3M Company et al	10/24/2018		Kennedy Hodges, LLP
0:18-cv-01980-JNE-DTS	Domiano, Joseph Jr. v. 3M Company	11/14/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02062-JNE-DTS	Pascucci, Michael v. 3M Company et al	11/15/2018		Kennedy Hodges, LLP
0:18-cv-02099-JNE-DTS	O'Neal, John v. 3M Company et al	11/15/2018		Kennedy Hodges, LLP
0:18-cv-02102-JNE-DTS	Porter, Kathleen v. 3M Company et al	11/15/2018		Kennedy Hodges, LLP
0:18-cv-02134-JNE-DTS	Knox, Kenneth v. 3M Company et al	11/19/2018		Kennedy Hodges, LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

EXHIBIT E

From: Ben Hulse

Sent: Friday, February 15, 2019 2:09 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>; 'schultz_chambers@mnd.uscourts.gov' <schultz_chambers@mnd.uscourts.gov>

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann <Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbeshher.com' <gzimmerman@meshbeshher.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>; 'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>; 'David J. Szerlag' <david@pritzkerlaw.com>; 'Wendy Thayer' <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for February 2019

Dear Judge Ericksen,

Although this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117, and the December 20, 2018 Amended Court Minutes, Dkt. No. 1651.

The spreadsheets with the lists of disputed cases are attached.

Best regards,

Ben Hulse

Counsel for Defendants

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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated February 15, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-02067-JNE-DTS	Norton, Lloyd v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018 1/11/2019	Meshbeshner & Spence
0:18-cv-02082-JNE-DTS	English, Alfred v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018 1/11/2019	Kennedy Hodges, LLP
0:18-cv-02087-JNE-DTS	Bellach, (Dimesa, Maria) v. 3M Company	7/23/2018	10/21/2018	11/9/2018 12/14/2018 1/11/2019	Napoli Bern Ripka Shkolnik LLP
0:18-cv-02095-JNE-DTS	Jenkins, Carole v. 3M Company et al	7/23/2018	10/21/2018	1/11/2019	Bachus & Schanker, LLC
0:18-cv-02117-JNE-DTS	Banks, Annina v. 3M Company et al	7/24/2018	10/22/2018	11/9/2018 12/14/2018 1/11/2019	The Miller Firm, LLC
0:18-cv-02394-JNE-DTS	Block, William v. 3M Company et al	8/15/2018	11/13/2018	12/14/2018 1/11/2019	Law Offices of Travis Walker, PA
0:18-cv-02509-JNE-DTS	Guillory, Yvonne v. 3M Company et al	8/28/2018	11/26/2018	12/14/2018 1/11/2019	The Olinde Firm, LLC
0:17-cv-01195-JNE-DTS	Arthur Jay Edmunds (McArthur) v. 3M Company et al	4/17/2017	12/7/2018		The Olinde Firm, LLC
0:17-cv-03448-JNE-DTS	Juliano, Sally (Harter, Gail) v. 3M Company et al	7/31/2017	10/11/2018		Schlichter Bogard & Denton, LLP
0:18-cv-02914-JNE-DTS	Chiavaroli, Ann v. 3M Company et al	10/11/2018	1/9/2019		Fears Nachawati, PLLC
0:18-cv-02939-JNE-DTS	Bennie, Salvatore et al v. 3M Company et al	10/17/2018	1/16/2019		Meshbeshner & Spence
0:18-cv-02944-JNE-DTS	Woloszyk, Leroy et al v. 3M Company et al	10/17/2018	1/16/2019		DeGaris & Rogers, LLC
0:18-cv-02978-JNE-DTS	Forker, Christine v. 3M Company et al	10/19/2018	1/18/2019		Morris Law Firm
0:18-cv-02982-JNE-DTS	Wilson, James v. 3M Company et al	10/22/2018	1/20/2019		Kennedy Hodges, LLP
0:18-cv-02995-JNE-DTS	Belisle, Todd et al v. 3M Company et al	10/23/2018	1/21/2019		Meshbeshner & Spence

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated February 15, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-03011-JNE-DTS	Jones, Tyrone v. 3M Company et al	10/25/2018	1/23/2019		The Miller Firm, LLC
0:18-cv-03014-JNE-DTS	Sosebee, Sylvia et al v. 3M Company et al	10/26/2018	1/24/2019		Meshbesher & Spence
0:18-cv-03073-JNE-DTS	Shaw, James v. 3M Company et al	11/1/2018	1/30/2019		Davis & Crump, P.C.
0:18-cv-03076-JNE-DTS	Salter v. 3M Company et al	11/1/2018	1/30/2019		Davis & Crump, P.C.
0:18-cv-03082-JNE-DTS	Weatherford, Thomas v. 3M Company et al	11/1/2018	1/30/2019		Kennedy Hodges, LLP
0:18-cv-03096-JNE-DTS	Pierce, James v. 3M Company et al	11/4/2018	2/2/2019		DeGaris & Rogers, LLC
0:18-cv-03101-JNE-DTS	Blades, Leanne v. 3M Company et al	11/5/2018	2/3/2019		Davis & Crump, P.C.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated February 15, 2019)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018 1/11/2019	Schlichter, Bogard & Denton, LLP
0:18-cv-01009-JNE-DTS	Woelfel, Rosemarie et al v. 3M Company et al	11/8/2018	11/29/2018	12/14/2018 1/11/2019	Brown Chiari, LLP
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	12/3/2018	12/24/2018	1/11/2019	Schlichter Bogard & Denton, LLP
0:18-cv-01722-JNE-DTS	Woodard, George v. 3M Company et al	10/1/2018	10/22/2018	11/9/2018 12/14/2018 1/11/2019	Pendley, Baudin & Coffin L.L.P.
0:18-cv-01724-JNE-DTS	Cooper, Roy et al v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018 1/11/2019	Pendley, Baudin & Coffin L.L.P.
0:18-cv-02014-JNE-DTS	Johnson, Sheri v. 3M Company et al.	12/3/2018	12/24/2018	1/11/2019	Bernstein Liebhard LLP
0:18-cv-02065-JNE-DTS	Sullivan, Jeffrey v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02080-JNE-DTS	McGuire, Maria v. 3M Company et al	11/15/2018	12/6/2018	12/14/2018 1/11/2019	Kennedy Hodges, LLP
0:18-cv-02211-JNE-DTS	Rhodes, Sarah v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02220-JNE-DTS	Torrez, Macario v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02225-JNE-DTS	Harris, Gloria v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019	Brown & Crouppen, PC
0:18-cv-02421-JNE-DTS	Miranda, Elsa v. 3M Company et al	1/16/2019	2/6/2019		Bernstein Liebhard LLP
0:18-cv-02727-JNE-DTS	Letcher, Alexander v. 3M Company et al	1/16/2019	2/6/2019		Kennedy Hodges, LLP
0:18-cv-02433-JNE-DTS	Latimer, Philomena v. 3M Company et al	12/18/2018	1/8/2019		Kennedy Hodges, LLP
0:18-cv-02467-JNE-DTS	McMillon, Anna v. 3M Company et al	12/19/2018	1/9/2019		Kennedy Hodges, LLP
0:18-cv-02471-JNE-DTS	Draggett, Beverly v. 3M Company et al	12/19/2018	1/9/2019		Kennedy Hodges, LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated February 15, 2019)

0:18-cv-02505-JNE-DTS	Campbell, Joan v. 3M Company et al	12/21/2018	1/11/2019		Kennedy Hodges, LLP
0:18-cv-02525-JNE-DTS	Fratino, Bruce et al v. 3M Company et al	12/21/2018	1/11/2019		Pendley, Baudin & Coffin L.L.P.
0:18-cv-02645-JNE-DTS	Nolan, Harriet v. 3M Company et al	1/3/2019	1/24/2019		Kennedy Hodges, LLP
0:18-cv-02740-JNE-DTS	Morgan, Daniel v. 3M Company et al	1/16/2019	2/6/2019		Kennedy Hodges, LLP
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-00088-JNE-DTS	Malinski, Michael v. 3M Company et al	11/7/2018	11/28/2018	12/14/2018 1/11/2019	Gustafson Gluek PLLC
0:18-cv-00220-JNE-DTS	Brasher, Michael v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018	Bernstein Liebhard LLP
0:18-cv-01634-JNE-DTS	Otero, Brenda v. 3M Company et al	12/4/2018	12/25/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-00758-JNE-DTS	Butler, Frances Eloise v. 3M Company et al	12/21/2018	1/11/2019		Fears Nachawati, PLLC
0:18-cv-01730-JNE-DTS	Oliver, Kimberly Gaston et al v. 3M Company et al	11/30/2018	12/21/2018		Riley & Jackson, P.C.
0:18-cv-01753-JNE-DTS	McCloat, Kenneth v. 3M Company et al	1/2/2019	1/23/2019		Kennedy Hodges, LLP
0:18-cv-01819-JNE-DTS	Ryan, Eraron v. 3M Company et al	12/18/2018	1/8/2019		Kennedy Hodges, LLP
0:18-cv-02063-JNE-DTS	Hogue, Anthony v. 3M Company et al	1/14/2019	2/4/2019		Kennedy Hodges, LLP
0:18-cv-02118-JNE-DTS	Yelverton, Annie v. 3M Company et al	1/14/2019	2/4/2019		The Miller Firm, LLC
0:18-cv-02165-JNE-DTS	Noto-Agnello, Vivian v. 3M Company et al	1/9/2019	1/30/2019		Kennedy Hodges, LLP
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated February 15, 2019)

0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company et al	12/4/2018	12/25/2018	1/11/2019	Bernstein Liebhard LLP
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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated February 15, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:15-cv-03950-JNE-DTS	LeBlanc, John (Shirley Thibodeaux) v. 3M Company et al	10/8/2018	12/14/2018 1/11/2019	Law Offices of Travis Walker, PA
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018	11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	10/11/2018	1/11/2019	Bernstein Liebhard LLP
0:17-cv-04476-JNE-DTS	Holstine, Rachel v. 3M Company et al	9/12/2018	12/14/2018 1/11/2019	Bernstein Liebhard LLP
0:17-cv-04777-JNE-DTS	Pine, Randy v. 3M Company et al.	9/4/2018	11/9/2018 12/14/2018 1/11/2019	Bernstein Liebhard LLP
0:17-cv-04877-JNE-DTS	McDonald, Ethel v 3M et al	10/8/2018	12/14/2018 1/11/2019	Bernstein Liebhard LLP
0:18-cv-00151-JNE-DTS	Russell, Janice v. 3M Company et al	7/16/2018	11/9/2018 12/14/2018 1/11/2019	Bernstein Liebhard LLP
0:18-cv-00432-JNE-DTS	Falcetta, Edward v. 3M Company	6/8/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00575-JNE-DTS	Ballasso, Marilyn v. 3M Company et al	6/27/2018	12/14/2018 1/11/2019	Gustafson Gluek PLLC
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00757-JNE-DTS	Homsher, Larry v. 3M Company et al	10/10/2018	1/11/2019	Bernstein Liebhard LLP

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated February 15, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00852-JNE-DTS	Villafranco, Leonard v. 3M Company et al	8/7/2018	11/9/2018 12/14/2018 1/11/2019	The Law offices of Travis R. Walker, P.A.
0:18-cv-00998-JNE-DTS	Caison, John et al v. 3M Company et al	8/22/2018	12/14/2018 1/11/2019	Gustafson Gluek PLLC
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019	Kennedy Hodges
0:18-cv-01031-JNE-DTS	Rhock, Leonard v. 3M Company et al	11/15/2018	12/14/2018 1/11/2019	The Miller Firm, LLC
0:18-cv-01051-JNE-DTS	Johnson, Alvin v. 3M Company	11/15/2018	12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01103-JNE-DTS	Tedford, Louise v. 3M Company	8/17/2018	11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018	11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01130-JNE-DTS	Deloach, Marsha v. 3M Company et al	8/30/2018	11/9/2018 12/14/2018 1/11/2019	The Miller Firm, LLC
0:18-cv-01167-JNE-DTS	Eans, James v. 3M Company	8/24/2018	11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01169-JNE-DTS	Gregory, Janice v. 3M Company	12/3/2018	1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated February 15, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01524-JNE-DTS	Gleason, Kathryn v. 3M Company	12/13/2018	1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01567-JNE-DTS	Gillis, Stanley v. 3M Company et al	11/1/2018	1/11/2019	Kennedy Hodges, LLP
18-cv-01654-JNE-DTS	Terrell, Elizabeth v. 3M Company et al	10/11/2018	12/14/2018 1/11/2019	Morris Law Firm
0:18-cv-01725-JNE-DTS	Heyward, Jacqueline v. 3M Company et al	10/15/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-01769-JNE-DTS	McCoy, Ethel v. 3M Company	8/14/2018	12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01771-JNE-DTS	Royal, Deborah v. 3M Company 3M Company et al	10/8/2018	12/14/2018 1/11/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01822-JNE-DTS	Jefferson, Frank v. 3M Company et al	10/24/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02062-JNE-DTS	Pascucci, Michael v. 3M Company et al	11/15/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02099-JNE-DTS	O'Neal, John v. 3M Company et al	11/15/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02102-JNE-DTS	Porter, Kathleen v. 3M Company et al	11/15/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-02134-JNE-DTS	Knox, Kenneth v. 3M Company et al	11/19/2018	1/11/2019	Kennedy Hodges, LLP
0:18-cv-00205-JNE-DTS	Shulz, Shelley v. 3M Company et al	10/16/2018		Bernstein Liebhard LLP
0:18-cv-00724-JNE-DTS	Burr, Cody v. 3M Company et al	12/21/2018		Morris Law Firm
0:18-cv-01571-JNE-DTS	Gohl, Brenda v. 3M Company et al	11/30/2018		Jones Ward, PLC

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated February 15, 2018)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01766-JNE-DTS	Schoolman, Dale v. 3M Company et al	12/11/2018		GoldenbergLaw, PLLC
0:18-cv-01768-JNE-DTS	Lamb, David v. 3M Company 3M Company et al	12/12/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01831-JNE-DTS	Conerly, David et al v. 3M Company et al	12/21/2018		Bachus & Schanker, LLC
0:18-cv-01832-JNE-DTS	McCray, Abraham v. 3M Company	12/13/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01833-JNE-DTS	Mussachia, Michael v. 3M Company	12/13/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01875-JNE-DTS	Byrge, Gary v. 3M Company et al	12/12/2018		Morris Law Firm
0:18-cv-02100-JNE-DTS	Berger, Clayton v. 3M Company et al	12/19/2018		Chaffin Luhana LLP
0:18-cv-02223-JNE-DTS	Tucker, Frank v. 3M Company et al	11/20/2018		Kennedy Hodges, LLP
0:18-cv-02236-JNE-DTS	Popielarz, Troy v. 3M Company et al	11/20/2018		Kennedy Hodges, LLP
0:18-cv-02263-JNE-DTS	Wenzel, David v. 3M Company et al	11/20/2018		Kennedy Hodges, LLP
0:18-cv-02367-JNE-DTS	Bailey, Peter v. 3M Company et al	12/17/2018		Kennedy Hodges, LLP
0:18-cv-02487-JNE-DTS	Blakes, Jimmy v. 3M Company et al	12/18/2018		Riley & Jackson, P.C
0:18-cv-02764-JNE-DTS	Walters, Carla v. 3M Company et al	1/3/2019		Justinian & Associates PLLC